



national
electrical and
communications
association

National Electrical and Communications Association - Submission

*Submission in response to Plus ES trial waiver application and
amendment*

Nov 2024

www.neca.asn.au

Overview

The National Electrical and Communications Association (NECA) provide this submission in response to the invitation to comment on the content of the Plus ES trial waiver application and amendment.

NECA is the peak body for Australia's electrical and communications industry, which employs 344,370 people and turns over more than \$82bn annually. NECA represents over 7,000 businesses performing works including the design, installation, and maintenance of electrical and electronic equipment in the construction, mining, air conditioning, refrigeration, manufacturing, communications, security, automation, and renewable energy sectors.

NECA has advocated on behalf of the electrotechnology industry for over 100 years and helps its members and industry operate in an efficient, safe, and regulatorily compliant manner. NECA represents the interests of electrical and communication businesses to all levels of government and in regulatory, legislative and industry development forums. It is also a foundation member of the Australian Chamber of Commerce and Industry (ACCI).

General comments

On behalf of its members, NECA are concerned that the PLUS ES proposal and subsequent amendment –

- i. **is of a scale (volume and time) that is well beyond the needs of a trial to prove the functionality of the solution.**

Specifically, it is unclear as to why it should take 500+ units and 5 years to verify the suitability of the PLUS ES solution.

- ii. **pre-empts a specific change to the regulatory environment.**

In light of current lobbying by Energy Networks Australia (ENA), produces an outcome where the parent entity could acquire substantial assets into their regulatory asset base should the national electricity rules be modified to suit.

- iii. **fails to consider the practical and safety implications of the proposed arrangement.**

In locating the equipment at a height above 2m, the design produces an outcome that is not compliant with existing Service and Installation Rules (NSW) and

introduces unnecessary hazards (eg work at heights) for workers required to work on or maintain the equipment.

iv. Preferred treatment

in the absence of transparent information, provides Plus ES with a preferential facilities access arrangement for the use of poles, and access to other DNSP resources (eg. staff sharing) to service the trial.

Conclusion

NECA considers that the proposal is excessive and mis-guided with respect to achieving the stated outcomes. Particularly when alternative providers in the market are able to provide better solutions on a commercial basis.

NECA would welcome the opportunity to meet with the AER to further discuss the issues raised. Please use the contact details below to organise further input.

Yours sincerely

[Redacted signature]

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Director of Policy, Technical and Safety

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